

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

LEMOND CYCLING, INC.,

Plaintiff,

v.

TREK BICYCLE CORPORATION,

Defendant and Third-Party
Plaintiff,

v.

GREG LEMOND,

Third-Party Defendant.

Case No. 08-CV-1010 (RHK-JSM)

DECLARATION OF
KRISTAL S. STIPPICH IN
SUPPORT OF TREK'S
MEMORANDUM IN
SUPPORT OF MOTION TO
COMPEL ANSWERS TO
INTERROGATORIES, TO
DEEM FACTS ADMITTED,
AND FOR EXPENSES

STATE OF WISCONSIN)
 :SS.
COUNTY OF MILWAUKEE)

I, KRISTAL S. STIPPICH, declare as follow:

I am an adult resident of the State of Wisconsin and one of the lawyers for defendant and third-party plaintiff Trek Bicycle Corporation ("Trek"). I make this Declaration on personal knowledge and in support of Trek's Memorandum in Support of Motion to Compel Answers to Interrogatories, to Deem Facts Admitted, and for Expenses.

1. Attached as Exhibit 1 is a true and correct copy of Trek's Second Set of Written Discovery to LeMond Cycling, Inc. and Greg LeMond, dated May 8, 2009.

2. Attached as Exhibit 2 is a true and correct copy of Answers and Objections to Trek's Second Set of Written Discovery to LeMond Cycling, Inc. and Greg LeMond, dated June 8, 2009.

3. Attached as Exhibit 3 is a true and correct copy of a letter dated June 29, 2009 from Ralph Weber to Denise Rahne.

4. Attached as Exhibit 4 is a true and correct copy of a letter dated July 1, 2009 from Jennifer Robbins to Ralph Weber.

5. Attached as Exhibit 5 is a true and correct copy of a letter dated July 6, 2009 from Kristal Stippich to Christopher Madel and Jennifer Robbins.

6. Attached as Exhibit 6 is a true and correct copy of a letter dated July 8, 2009 from Jennifer Robbins to Kristal Stippich.

7. Attached as Exhibit 7 are true and correct copies of pages 1 and 4-5 of the undated Declaration of Greg LeMond filed with Plaintiff's Memorandum of Law in Support of Motion for Summary Judgment on July 10, 2009.

8. Attached as Exhibit 8 are true and correct copies of pages 119-127 of the April 7, 2009 deposition testimony of Mr. John Burke, and Exhibits 138-139 thereto.

9. Attached as Exhibit 9 are true and correct copies of pages 1 and 8-13 of the expert report of Dr. John Nevin, dated June 9, 2009.

10. Attached as Exhibit 10 are true and correct copies of a condensed version (with duplicates omitted) of the consumer emails and letters identified in Request for Admission No. 1, put in chronological order by date.

11. Attached as Exhibit 11 are true and correct copies of a condensed version (with duplicates omitted) of the dealer emails identified in Request for Admission No. 1, put in chronological order by date.

12. Attached as Exhibit 12 are true and correct copies of blog posts identified in Request for Admission No. 4.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14, 2009.

s/Kristal S. Stippich
Kristal S. Stippich (Wisc. Reg. No. 1061028)
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